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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268–0001

COMPETITIVE PRODUCT PRICES
EXPRESS MAIL & PRIORITY MAIL CONTRACT 8 (MC2009-33)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2009-44

MOTION OF THE UNITED STATES POSTAL SERVICE FOR TEMPORARY RELIEF

(November 30, 2012)

In Order No. 1534, issued November 6, 2012, the Commission granted the Postal Service's request for a temporary extension of the contract in the instant docket, until December 10, 2012. The Postal Service and the customer have been working diligently to reach a new agreement to avoid any interruption in the Postal Service's ability to provide this customer access to negotiated rates. The Postal Service expects to have a signed replacement contract ready to file with the Commission within the next week, and may have a contract ready to file prior to December 10, 2012.

The Postal Service is filing this motion more than seven days prior to the contract's expiration date, in accordance with Order No. 1523 (November 1, 2012). The Postal Service respectfully requests that the Commission grant an additional thirty (30) day extension to allow the existing contract to remain in effect until such time as the Commission is able to complete its review of the new agreement. Thus, the proposed extension would only last for a finite and relatively short period of time. An additional thirty day extension would avoid any interruption in the customer's access to negotiated rates as a result of the processes that it must participate in when it does business with the Postal Service, rather than with one of the Postal Service's competitors.

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In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity, the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive products list for thirty additional days.

Respectfully submitted,

UNITED STATES POSTAL SERVICE By its attorneys:

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